

## REMARKS

1. Claims 1 and 3-17 were last presented for examination. All pending claims were rejected in the outstanding Office Action. By the foregoing Amendments, claims 1, 3-5, 11-12 and 15-16 have been amended. No claims have been added or canceled. Thus, upon entry of this paper, claims 1 and 3-17 will remain pending in this application. Of these sixteen (16) claims, two (2) claims (claims 1 and 12) are independent. These amendments are believed not to introduce new matter and their entry is respectfully requested. Further, the foregoing Amendments do not narrow the scope of the claims in any way.
2. Claims 1 and 3-17 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite and failing to particularly point out and distinctly claim the subject matter which applicant regard as the invention. Applicant has amended the claims to accommodate the section 112, second paragraph rejections as well as to correct other informalities.
3. In a series of telephone conferences with the Examiner conducted on January 4, 2005, the Examiner indicated that the Examiner and the Examiner's supervisor agreed that the above Amendments accommodate the Section 112 rejections. Accordingly, Applicant respectfully requests that the rejections be withdrawn.
4. The Examiner rejected claims 1, 3, 4, 5, 7, 11, 12, 14 and 15 as being anticipated by U.S. Patent No. 6,127,038 to McCullough ("McCullough"). The Examiner further rejected claims 6, 8-10, 13 and 17 as being unpatentable over *McCullough* in view of JP 200034457A to Kotani *et al.* ("Kotani"), and has rejected claim 16 as being unpatentable over *McCullough* in view of US Patent 5,639,989 to Higgins III ("Higgins").
5. Specifically, with regard to independent claims 1 and 12, the Examiner asserts that *McCullough*'s first coating layer 14 bridges across at least one opening of a cavity on a printed circuit board to encapsulate and seal the cavity, and to render the cavity substantially inaccessible to subsequently-applied coatings, thereby anticipating Applicant's invention as recited in independent claims 1 and 12. (*See*, Office Action, pg. 4.) Applicant respectfully disagrees.
6. *McCullough* is directed to a printed circuit board coating which does not

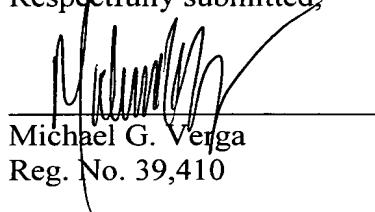
delaminate or crack. (*See, McCullough*, col. 1, lns. 5-10, 33-44.) The *McCullough* conformal coating comprises two layers: a first coating layer 14 deposited on printed circuit board surfaces 20, component surface 22 and lead surfaces 24, and a second coating layer 16 deposited on first coating 14. Together, layers 14 and 16 provide a continuous, stratified coating which is sealed and corrosion resistant. (*See, McCullough*, col. 3, lns. 8-19.)

7. Contrary to the Examiner's assertions, nowhere does *McCullough* disclose, teach or suggest that first coating layer 14 bridges across an opening of a volume of space on the printed circuit board as recited in Applicant's independent claims 1 and 12. In contrast, the two layers 14, 16 of *McCullough*'s coating are separately applied to all surfaces of the printed circuit board, including surfaces that define the walls of cavities on the printed circuit board. See, for example, *McCullough*'s Figure 1, which is a sectional view of a printed circuit board with a single component mounted thereon. There is a cavity or volume of space bounded by surfaces of the component, the component leads and the printed wiring board. Rather than bridging across the openings to the volume of space to render the volume of space substantially inaccessible to subsequently-applied coatings (as recited in claim 1), or to encapsulate and seal the at least one volume of space (as recited in claim 12) *McCullough*'s first coating layer 14 is deposited on printed circuit board surfaces to prepare the surfaces for the second coating layer 16. (*See, McCullough*, col. 3, lns. 15-17.) This is illustrated in *McCullough*'s Figure 1, in which coating layer 14 and coating layer 16 are both applied to all surfaces of the printed circuit board, including those surfaces of the component body, component leads and printed wiring board that define the boundaries of the volume of space. (*See, McCullough*, Fig. 1; col. 2, his. 35-43; col. 3, lns. 2-5.)

8. For at least these reasons, Applicant respectfully asserts that the Examiner has misapprehended the teachings of *McCullough*, resulting in an improper rejection of Applicant's claims 1 and 12. Accordingly, Applicant's respectfully asserts that the rejections of claims 1 and 12 be withdrawn. Dependent claims 3-11 and 13-17 are patentable for at least the same reasons.

9. In view of the foregoing, this application should be in condition for allowance. A notice to this effect is respectfully requested.

Respectfully submitted,

  
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